

#4047

8

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

March 27, 2012

TO: Internal File

THRU: Suzanne Steab, Team Lead *SS*

FROM: Angela Nance, Business Analyst *an*

RE: Midterm Permit Review, Mountain Coal Company, Gordon Creek Mine, C/007/0016, Task ID #4047

SUMMARY:

In accordance with R645-303-211, The Division is required to review each active permit during its term. The Division commenced the Midterm Review for the Gordon Creek Mine on December 1, 2011. The ownership and control information was compared to the MRP to ensure that it is current and correct as compared to the information found in the Applicant Violator System (AVS). The information in the MRP was dated 1994 and so as expected it was extremely outdated. The Operator submitted a response to the discrepancies on March 14, 2012.

TECHNICAL MEMO

TECHNICAL ANALYSIS:

GENERAL CONTENTS

IDENTIFICATION OF INTERESTS

Regulatory Reference: 30 CFR 773.22; 30 CFR 778.13; R645-301-112

Analysis:

Mountain Coal Company is a Delaware corporation with only one shareholder – Atlantic Richfield Co. Information regarding the ownership and control of these entities can be found in the Legal and Financial section of Volume 1 of the Gordon Creek MRP.

Findings:

The Ownership and Control information in the MRP is dated 10/16/94 and it is out of date compared to the information found in AVS. The Operator indicated that the updated information is in the Annual Report. The Division requires updated Ownership and Control information in the MRP not the Annual Report. The Operator provided updated information. The information was sent to AVS and it will be incorporated in the MRP.

RECOMMENDATION:

Approval of the Response to Midterm Review is recommended.

O:\007016.GC2\WG4047\WG4047an.docx